Netflix, Inc. v. Blockbuster, Inc.

Doc. 211 Att. 11

EXHIBIT J

Netflix, Inc. v. Blockbuster Inc. USDC, Northern District of California Case No. C 06 2361

CATEGORIES OF WITHHELD SHEARMAN & STERLING LLP DOCUMENTS

DESCRIPTION Internal SS communications regarding prior art investigators reflecting SS attorney mental
impressions Communications between SS and BBI regarding prior art investigators containing or requesting SS legal advice and/or reflecting SS attorney mental impressions.
Various internal SS memoranda, notes, and documents related to prior art investigators reflecting SS attorney mental impressions
Communications between SS and BBI regarding various litigation defenses in connection with invalidity of U.S. Patent No. 6,584,450 (" '450 patent") containing or requesting SS legal advice and/or reflecting SS attorney mental impressions
Various internal SS communications, memoranda, notes and documents related to litigation defenses in connection with invalidity of the '450 patent reflecting SS attorney mental impressions
Internal SS communications regarding interviews of BBI employees in connection with invalidity of the '450 patent reflecting SS attorney mental impressions

00°. NO.	DOC. PARTICIPANTS	DESCRIPTION	PRIVILEGE
12.	12. SS/BBI	Communications between SS and BBI regarding interviews of BBI employees in connection with invalidity of the '450 patent containing or requesting SS legal advice and/or reflecting SS attorney mental impressions	Attorney-Client; Work Product
13.	13. SS	Various internal SS memoranda, notes and documents related to interviews of BBI employees in connection with invalidity of the '450 patent reflecting SS attorney mental impressions	Work Product
14.	14. SS	BBI documents received by SS reflecting SS attorney mental impressions	Work Product